



PHILIP L. BROWNING  
Director

**County of Los Angeles  
DEPARTMENT OF CHILDREN AND FAMILY SERVICES**

425 Shatto Place, Los Angeles, California 90020  
(213) 351-5602

August 10, 2012

To: Supervisor Zev Yaroslavsky, Chairman  
Supervisor Gloria Molina  
Supervisor Mark Ridley-Thomas  
Supervisor Don Knabe  
Supervisor Michael D. Antonovich

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From: Philip L. Browning  
Director

A handwritten signature in blue ink, appearing to be "P. Browning", written over the printed name and title.

**FLORENCE CRITTENTON SERVICES OF ORANGE COUNTY, INC., d.b.a.  
CRITTENTON SERVICES FOR CHILDREN AND FAMILIES FOSTER FAMILY  
AGENCY CONTRACT COMPLIANCE MONITORING REVIEW**

The Out-of-Home Care Management Division (OHCMD) conducted a review of Florence Crittenton Services of Orange County d.b.a. Crittenton Services for Children and Families Foster Family Agency (Crittenton FFA) in May 2012, at which time they had three DCFS placed children in two homes.

Crittenton FFA is located in Orange County and provides services to Los Angeles County Department of Children and Family Services (DCFS) foster youth. According to Crittenton FFA's program statement, its stated goal is "to provide trained foster parents who can offer a nurturing and protecting environment to children of both sexes from birth to seventeen years of age." Crittenton FFA is licensed to serve children ranging from birth through 17.

For the purpose of this review, three children were selected for the review. The children's case files were reviewed and two of the three children were interviewed as one child was too young to be interviewed. The placed children's overall average length of placement was three months and the average age was 10. Two certified foster parent files were reviewed; three discharge files and three staff files were reviewed for compliance with Title 22 Regulations and the County contract requirements.

There were no Los Angeles County placed children who were prescribed psychotropic medication at the time of the review.

### **SCOPE OF REVIEW**

The purpose of this review was to assess Crittenton FFA's compliance with the County contract and State regulations. The visit included a review of the Agency's program statement, administrative internal policies and procedures, three placed children's case files, two certified foster parent files and three personnel files. Two certified foster homes were visited where the foster parents were interviewed to assess the quality of care and supervision provided to children. Two placed children were interviewed to assess the care and services they were receiving.

A copy of this report has been sent to the Auditor-Controller (A-C) and Community Care Licensing (CCL).

### **SUMMARY**

During our review, the children interviewed reported feeling safe, having been provided with good care and appropriate services; being comfortable in their environment and treated with respect and dignity.

The deficiencies noted during the monitoring review were related to not reporting Special Incident Reports (SIRs) via the I-track system. We also noted that the Agency was not utilizing the required Needs and Services Plan (NSP) template and were not sending the NSPs to the children's case-carrying Children's Social Workers (CSWs) for authorization to implement. Lastly, we noted that one child had been placed in the home for nine days and had not been enrolled in or attending a school program.

Based on our review, the aforementioned deficiencies revealed the need for thorough documentation. Additionally, routine monitoring of the files by supervisory staff would appear to eliminate the issues identified. Overall, Crittenton FFA was providing good care and services to placed children and support to the certified foster parents, which is evident in the relationships formed with the children, Agency staff, and certified foster parents.

In conclusion, Crittenton FFA was receptive to implementing some systemic changes to improve their compliance with regulations and the County Contract. The Vice-President of Foster Care and Adoptions/Administrator agreed to address the noted deficiencies in a Corrective Action Plan (CAP).

### **NOTABLE FINDINGS**

The following were notable findings of our review:

- We noted that there were SIRs in the children's files that were appropriately documented and were submitted to the placed children's CSWs via fax; however, the Agency was not linked to or utilizing the Los Angeles County I-track system to report SIRs to their OHCMD monitor and the case-carrying CSW. During the review, OHCMD provided the Agency with the DCFS contact person to initiate DCFS communication via the I-track system. As per the Vice-President of Foster Care and Adoption/Administrator, Crittenton was linked to the I-track system on May 30, 2012, and the staff was individually trained on the system and the SIR reporting procedure by May 31, 2012.
- Two children's files had initial and updated Needs and Services Plans (NSPs) that did not have the required CSW signatures or documented attempts to obtain the signatures for the authorization to implement the NSPs.
- Initial NSPs were not comprehensive for two children as there were no CSW signatures, or documented agency attempts to obtain the signatures to implement the plans and the NSPs were not completed on the required NSP template per County contract requirements.
- Updated NSPs were not comprehensive for two children as there were no CSW signatures or documented agency attempts to obtain the signatures to implement the plans. In addition, NSPs were not completed on the required NSP template per County contract requirements.
- One youth, placed May 15, 2012, had not been enrolled in a school program at the time of this review on May 21, 2012, and was not attending school. There was no documentation in the child's file indicating the reason for the delay. The foster parents indicated that they were waiting for their newly assigned CSW to direct them since she was placed late in the school year and had not been in school for over a year, and they were not planning to enroll her until the fall semester. The foster parents reported to the FFA social worker that they were informed by another Orange County foster parent that the school would not accept children at the end of the year. The matter was brought to the FFA and CSW's attention during the review. The CSW, recently assigned to the youth's case following her detention, had not yet met the youth, but indicated that the youth needed to be immediately enrolled in a school program. The FFA staff indicated that the foster mother contacted the school district who informed her that since the child was so behind in credits, she needed to be enrolled in an alternative educational program. As per the FFA's Vice President of Foster Care and Adoption, the certified foster parents took the youth to enroll in Access, an independent studies program on June 8, 2012, and that the FFA staff would monitor for on-going compliance.

## **EXIT CONFERENCE**

The following are highlights from the Exit Conference held June 6, 2012.

### **In attendance:**

Debra Webb, Vice-President of Foster Care and Adoption/Administrator Crittenton FFA and Cori Shaffer, Monitor, DCFS, OHCMD.

### **Highlights:**

Crittenton FFA Vice-President of Foster Care and Adoption/Administrator, Debra Webb, was in agreement with our findings and recommendations.

Crittenton FFA's Vice-President of Foster Care and Adoption/Administrator submitted an approved written CAP, which addressed each recommendation noted in this compliance report. The approved CAP is attached.

We will assess for full implementation of the recommendations during our next monitoring review.

If you have any questions, please call me or your staff may contact Aldo Marin, Board Relations Manager at (213) 351-5530.

PLB:RRS:KR  
EAH:Nf:cs

### **Attachments**

c: William T Fujioka, Chief Executive Officer  
Wendy Watanabe, Auditor-Controller  
Public Information Office  
Audit Committee  
Joyce Cappelle, Executive Director, Crittenton Services for Children and Families FFA  
Jean Chen, Regional Manager, Community Care Licensing

**FLORENCE CRITTENTON SERVICES OF ORANGE COUNTY, INC, DBA  
CRITTENTON SERVICES FOR CHILDREN AND FAMILIES FOSTER FAMILY  
AGENCY  
CONTRACT COMPLIANCE MONITORING REVIEW-SUMMARY**

**801 Chapman Avenue, Suite 230  
Fullerton, California 92831  
License Number: 306099612**

	<b>Contract Compliance Monitoring Review</b>	<b>Findings: May 2012</b>
I	<p><b><u>Licensure/Contract Requirements</u></b> (6 Elements)</p> <ol style="list-style-type: none"> <li>1. Timely Notification for Child's Relocation</li> <li>2. SIRs Documented and Cross-Reported</li> <li>3. Runaway Procedures</li> <li>4. Community Care Licensing Citations, Out-of-Home Care Management Division Reports on Safety and Physical Deficiencies</li> <li>5. If Applicable, FFA Ensures Complete Required Whole Foster Family Home Training</li> <li>6. FFA pays Certified Foster Parents Whole Foster Family Home Payments</li> </ol>	<ol style="list-style-type: none"> <li>1. Full Compliance</li> <li>2. Needs Improvement</li> <li>3. Full Compliance</li> <li>4. Full Compliance</li> <li>5. Not Applicable</li> <li>6. Not Applicable</li> </ol>
II	<p><b><u>Certified Foster Homes</u></b> (13 Elements)</p> <ol style="list-style-type: none"> <li>1. Home Study Prior to Certification</li> <li>2. Contact with References/Including Check with OHCMD</li> <li>3. Safety Inspection Prior to Certification</li> <li>4. Timely DOJ, FBI, CACI</li> <li>5. Health Screening Prior to Certification</li> <li>6. Required Training Prior to Certification</li> <li>7. Current Certificate of Approval on File Including Capacity</li> <li>8. Home Inspection/Evaluations for Re-certification</li> <li>9. Completed Training Hours for Re-certification</li> <li>10. CPR/First-Aid/Water Safety Certificates</li> <li>11. CDL/Auto Insurance</li> <li>12. Other Adults: DOJ/FBI/CACI/Other Required Docs</li> <li>13. Transportation</li> </ol>	<p>Full Compliance (ALL)</p>

III	<p><b><u>Facility and Environment</u></b> (8 Elements)</p> <ol style="list-style-type: none"> <li>1. Exterior Well Maintained</li> <li>2. Common Areas Maintained</li> <li>3. Children's Bedrooms/Interior Maintained</li> <li>4. Sufficient Recreational Equipment</li> <li>5. Sufficient Educational Resources</li> <li>6. Adequate Perishable and Non Perishable Food</li> <li>7. Disaster Drills Conducted</li> <li>8. Allowance Logs</li> </ol>	Full Compliance (ALL)
IV	<p><b><u>Maintenance of Required Documentation and Service Delivery</u></b> (11 Elements)</p> <ol style="list-style-type: none"> <li>1. DCFS CSW Authorization to Implement NSPs</li> <li>2. Children's Participation in the Development of NSPs</li> <li>3. NSPs Implemented and Discussed with Foster Parents</li> <li>4. Children's Progress Towards Meeting Goals</li> <li>5. Timely Developed Initial NSPs with Child</li> <li>6. Timely Comprehensive Initial NSPs with Child</li> <li>7. Therapeutic Services Received</li> <li>8. Recommended Assessments/Evaluations Implemented</li> <li>9. DCFS CSWs Monthly Contacts Documented</li> <li>10. Timely Developed Updated NSPs with Child</li> <li>11. Timely Comprehensive Updated NSPs with Child</li> </ol>	<ol style="list-style-type: none"> <li>1. Needs Improvement</li> <li>2. Full Compliance</li> <li>3. Full Compliance</li> <li>4. Full Compliance</li> <li>5. Full Compliance</li> <li>6. Full Compliance</li> <li>7. Full Compliance</li> <li>8. Full Compliance</li> <li>9. Full Compliance</li> <li>10. Full Compliance</li> <li>11. Needs Improvement</li> </ol>
V	<p><b><u>Education and Workforce Readiness</u></b> (7 Elements)</p> <ol style="list-style-type: none"> <li>1. Children Enrolled in School Within Three Days</li> <li>2. Children Attended School as Required</li> <li>3. Agency Facilitates Child's Educational Goals</li> <li>4. Child's Academic and/or Attendance Increase</li> <li>5. Current IEPs Maintained</li> <li>6. Current Report Cards Maintained</li> <li>7. Agency Facilitates Children's Participation in YDS/Equivalent/Vocational Programs</li> </ol>	<ol style="list-style-type: none"> <li>1. Needs Improvement</li> <li>2. Needs Improvement</li> <li>3. Full Compliance</li> <li>4. Full Compliance</li> <li>5. Full Compliance</li> <li>6. Full Compliance</li> <li>7. Full Compliance</li> </ol>

VI	<b><u>Health and Medical Needs</u></b> (6 Elements) <ol style="list-style-type: none"> <li>1. Initial Medical Examinations Conducted</li> <li>2. Initial Medical Examinations Timely</li> <li>3. Follow-up Medical Examinations Timely</li> <li>4. Initial Dental Examinations Conducted</li> <li>5. Initial Dental Examinations Timely</li> <li>6. Follow-up Dental Examinations Timely</li> </ol>	Full Compliance (ALL)
VII	<b><u>Psychotropic Medications</u></b> (2 Elements) <ol style="list-style-type: none"> <li>1. Current Court Authorization for Administration of Psychotropic Medication</li> <li>2. Current Psychiatric Evaluation Review</li> </ol>	Not Applicable (ALL)
VIII	<b><u>Personal Rights and Social Emotional Well-Being</u></b> (13 Elements) <ol style="list-style-type: none"> <li>1. Children Informed of Foster Home's Policies and Procedures</li> <li>2. Children Feel Safe</li> <li>3. Satisfaction with Meals and Snacks</li> <li>4. Foster Parents Treatment of Children with Respect and Dignity</li> <li>5. Appropriate Rewards and Discipline System</li> <li>6. Children Allowed Private Visits, Calls, and Correspondence</li> <li>7. Children Free to Attend Religious Services/Activities</li> <li>8. Reasonable Chores</li> <li>9. Children Informed About Psychotropic Medication</li> <li>10. Children Aware of Right to Refuse Psychotropic Medication</li> <li>11. Children Informed About Voluntary Refusal of Medical and Dental Care</li> <li>12. Children Participation in At-Home, School, Community Activities</li> <li>13. Children Participation in Extra-Curricular Activities</li> </ol>	Full Compliance (ALL)



IX	<b><u>Personal Needs/Survival and Economic Well-Being</u></b> (8 Elements) <ol style="list-style-type: none"> <li>1. Clothing Allowance</li> <li>2. On-going Clothing Inventories of Adequate Quantity</li> <li>3. On-going Clothing Inventories of Adequate Quality</li> <li>4. Involvement in Selection of Clothing</li> <li>5. Provision of Personal Care Items</li> <li>6. Minimum Monetary Allowances</li> <li>7. Management of Allowance</li> <li>8. Encouragement and Assistance with Life Book</li> </ol>	Full Compliance (ALL)
X	<b><u>Discharged Children</u></b> (3 Elements) <ol style="list-style-type: none"> <li>1. Stabilization of Placement Prior to Discharge</li> <li>2. Discharge Summary Completed</li> <li>3. Child Completed High School</li> </ol>	Full Compliance (ALL)
XI	<b><u>Personnel Records</u></b> (14 Elements) <ol style="list-style-type: none"> <li>1. DOJ Timely Submitted</li> <li>2. FBI Timely Submitted (After January 1, 2008)</li> <li>3. CACIs Timely Submitted</li> <li>4. Signed Criminal Background Statement Timely</li> <li>5. Education/Experience Requirement</li> <li>6. Employee Health-Screening Timely</li> <li>7. Valid Driver's License</li> <li>8. Signed Copies of FFA Policies and Procedures</li> <li>9. Initial Training Documentation</li> <li>10. One-hour Training of Child Abuse Reporting</li> <li>11. CPR Training Documentation</li> <li>12. First-Aid Training Documentation</li> <li>13. On-going Training Documentation</li> <li>14. Social Workers Appropriate Case Ratio</li> </ol>	Full Compliance (ALL)



**FLORENCE CRITTENTON SERVICES OF ORANGE COUNTY, INC, DBA  
CRITTENTON SERVICES FOR CHILDREN AND FAMILIES FOSTER FAMILY  
AGENCY  
CONTRACT COMPLIANCE MONITORING REVIEW**

**801 Chapman Avenue, Suite 230  
Fullerton, CA 92831  
License Number: 306099612**

The following report is based on a "point in time" monitoring visit. This compliance report addresses findings noted during the May 2012 monitoring review.

**CONTRACTUAL COMPLIANCE**

Based on the results of the compliance review, Crittenton FFA was in full compliance with seven of 11 sections of our contract compliance review, and one section, Psychotropic Medication, was not applicable as there were no children prescribed psychotropic medication during the review. The seven sections in full compliance include: Certified Foster Homes; Facility and Environment; Health and Medical Needs; Personnel Rights and Social/Emotional Well-Being; Personal Needs/Survival and Economic Well-Being; Discharged Children and Personnel Records. The following report details the results of our review:

**LICENSURE/CONTRACT REQUIREMENTS**

Based on our review of three children case files and/or documentation from the provider, Crittenton FFA was in full compliance with five of six elements reviewed in the area of Licensure/Contract Requirements.

We noted that there were SIRs in the children's files that were appropriately documented and were submitted to the placed children's CSWs via fax; however, the Agency was not linked to or utilizing the Los Angeles County I-track system to report SIRs to their OHCMD monitor and the case-carrying CSW. During the review, OHCMD provided the Agency with the DCFS contact person to initiate DCFS communication via the I-track system. As per the Vice-President of Foster Care and Adoption/Administrator, Crittenton was linked to the I-track system on May 30, 2012, and the staff was individually trained on the system and the SIR reporting procedure by May 31, 2012.

**Recommendation:**

Crittenton FFA's management shall ensure that:

1. All staff members are properly trained and utilize the I-track system to report and track SIRs for Los Angeles County DCFS placed children.

### **MAINTENANCE OF REQUIRED DOCUMENTATION AND SERVICE DELIVERY**

Based on our review of three children's files and/or documentation from the provider and our visits to the certified foster homes, Crittenton FFA fully complied with eight of eleven elements reviewed in the area of Maintenance of Required Documentation and Service Delivery.

During the file review, we noted that for two of the three children reviewed (one child was placed in May 2012), there was no documentation indicating that the FFA submitted the children's Needs and Services Plans (NSP) to the CSW for authorization to implement the plans. The form they were using did not have a signature line for the CSWs. The FFA Vice-President of Foster Care and Adoption/Administrator indicated that they would ensure that the Agency will immediately begin using the required NSP template for all Los Angeles County placed children and that they would send the completed report to the CSWs for authorization and document all attempts made to the CSWs in the children's files.

Due to not utilizing the required NSP template and lack of CSW's signatures or lack of documentation that the FFA submitted the NSPs to the CSWs for signatures, we concluded that the NSPs were not comprehensive for the initial and updated NSPs for two of the children. The FFA staff attended the NSP training with CCL/OHCMD in January 2012. The FFA staff provided individual training to all of their social work staff as of May 31, 2012. On July 11, 2012, OHCMD verified with the County Information System Development (ISD) Section that Crittenton FFA has access to I-track.

#### **Recommendation:**

Crittenton FFA's management shall ensure that:

2. The FFA to submit the children's NSPs to the case-carrying CSWs for authorization to implement the NSPs and that documentation is maintained in the children's files.
3. Initial NSPs are comprehensive and are completed on the required NSP template and that documentation is maintained in the children's files.
4. Updated NSPs are comprehensive and are completed on the required NSP template and documentation is maintained in the children's files.

### **EDUCATION AND WORKFORCE READINESS**

Based on our review of three children's files and/or documentation from the provider and face-to-face interviews with children, Crittenton FFA fully complied with six of seven elements reviewed in the area of Education and Workforce Readiness.

During an interview with the 17 year-old foster youth at her certified foster home on May 21, 2012, we were informed that the youth, placed with the Agency on May 15, 2012, had not yet been enrolled in school. Per the youth (detained from a family member on March 18, 2012), and her foster parents, they were awaiting the newly assigned case-carrying CSW to come to the home and meet with them and to instruct them on school enrollment as it was late in the school year. According to the youth, she had not been enrolled in a school program for over a year as she was pregnant and caring for her infant prior to being placed in foster care. Per the FFA staff they would ensure that the youth was immediately enrolled in a school program to include a plan for her infant daughter and that documentation would be maintained in the file.

**Recommendations:**

Crittenton FFA's management shall ensure that:

5. All school-aged placed children are enrolled in a school program within three days of placement and documentation is maintained in the file. Also that the FFA staff maintain on-going monitoring to ensure compliance.
6. All school aged children attended school as required and documentation is maintained in the files.

**PRIOR YEAR FOLLOW-UP FROM THE AUDITOR-CONTROLLER'S CONTRACT  
REVIEW REPORT**

**Objective**

Determine the status of the recommendations reported in the A-C's prior compliance report.

**Verification**

A monitoring review of Crittenton FFA has not been posted by the A-C.

**MOST RECENT FISCAL REVIEW CONDUCTED BY THE AUDITOR-CONTROLLER**

A fiscal review of Crittenton FFA has not been posted by the A-C.

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Achieve.  
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[www.crittentonsocal.org](http://www.crittentonsocal.org)



June 13, 2012

Cori Shaffer  
LA County Out of Home Placement Division  
9320 Telstar Ave.  
Los Angeles County,  
CA 91731

Dear Cori,

This is the Plan of Correction for Crittenton Services FFA Monitoring Review that was conducted on May 21, 2012.

1) Licensure/Contract Requirement:

Special Incident Reports (SIRs) were not appropriately documented in the I-Track system.

Crittenton has contacted OHCMD and is now signed up and trained on the use of this system. Crittenton will ensure that this system is in place and will be used. Supervisor will monitor I-Track usage.

2) Maintenance of Required Documentation and Service Delivery:

Crittenton FFA did not obtain or document any efforts to obtain DCFS CSWs' authorization as indicated by signatures.

Crittenton will ensure that CSWs' are notified by e-mail or Fax and document any/all attempts. Related documents will be filed in the child's case file.

Needs and Service Plans (NSPs) documentation was not input on the correct updated template.

Staff has been re-trained on 6-12-12 on the appropriate use of the county document to ensure that a comprehensive initial/updated service plan is completed and updated on every child. Crittenton Supervisors will monitor the staff to ensure the correct and ongoing use of this document.

3) Education and Workforce Readiness:

Minor was not enrolled in school within the 3 day time frame.

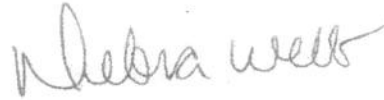
The foster mother was misinformed by another foster parent in the same school system that it was "too late in the school year and they would not enroll her." The foster parent did subsequently contact the school district and was informed that the child was so behind in credits she needed an alternative school program. The minor was admitted into Access school where she has the opportunity to complete the credits needed to graduate. Crittenton will ensure that in the future the Social Worker will assist in the enrollment of each child to meet the contractual agreements of the county. The agency will train the foster parents of these requirements. In addition, all Social Workers will be trained on requirements and their supervisor will actively monitor for compliance.

Crittenton is committed to providing quality services as outlined in our contract to all of the children placed in our care. If you need any other assistance, please call 714-680-8200.

Sincerely,



Ana Eykel, MFT-I  
Foster Care Director



Debra Webb, LCSW  
VP Of Foster Care & Adoption